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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ALASKA

ALASKA INDUSTRIAL DEVELOPMENT
AND EXPORT AUTHORITY, *et al.*,

Plaintiffs,

and

STATE OF ALASKA,

Intervenor-Plaintiff,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States, *et*
al.,

Defendants,

and

NATIVE VILLAGE OF VENETIE TRIBAL
GOVERNMENT, *et al.*,

Intervenor-Defendants.

Case No. 3:21-cv-00245-SLG

**JOINT MOTION TO MODIFY
SCHEDULE**

Plaintiffs, Intervenor-Plaintiff, and Defendants hereby jointly move the Court for a modification of the schedule for this case. Counsel for Intervenor-Defendants Gwich'in Steering Committee, et al., and Native Village of Venetie Tribal Government, et al., have indicated that they do not oppose this motion. Pursuant to the current schedule, Defendants lodged the administrative record on June 3, 2022. Defendants subsequently informed the parties that Defendants intend to add documents to the administrative record but will need additional time to do so.

Under the current schedule, there is a July 1, 2022 deadline for any motion(s) to supplement or otherwise challenge the sufficiency of the administrative record. However, the parties will not be in a position to identify record deficiencies until the administrative record is finalized. As a result of this, and to accommodate counsels' schedules, Plaintiffs, Intervenor-Plaintiff, and Defendants jointly move to modify the case schedule as follows:

1. Defendants shall finalize the administrative record by August 15, 2022, subject to any modifications pursuant to Paragraphs 2-3 below.
2. The parties shall confer and informally attempt to resolve any disputes concerning the administrative record. The parties shall notify Defendants of any issues concerning the sufficiency of the administrative record on or before August 29, 2022.
3. If the parties do not informally resolve issues concerning the administrative record, any motion(s) to supplement or otherwise challenge the sufficiency of the administrative record shall be filed on or before September 12, 2022. If such a motion is filed, Defendants'

response shall be due on or before October 10, 2022, and any reply shall be due on or before October 24, 2022.

4. The parties shall present to the Court a proposed briefing schedule within fourteen days of a decision resolving any such motion(s) or, in the absence of such a motion, on or before September 26, 2022.

Dated this 30th day of June, 2022

/s/ Kyle W. Parker

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JOINT MOTION TO MODIFY SCHEDULE

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CERTIFICATE OF SERVICE

I hereby certify on June 30, 2022, I caused to be electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification and electronic service of the same to all counsel of record.

HOLLAND & HART LLP

/s/ Kyle W. Parker